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Attorney for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,	:	Case No. 2:19-cr-296
	:	
Plaintiff,	:	
	:	
v.	:	<u>STIPULATION TO</u>
	:	<u>EXTEND PRE-TRIAL MOTION</u>
SIGALA SALAZAR,	:	<u>DEADLINES</u>
	:	
Defendant.	:	

IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich, United States Attorney, and Supriya Prasad, Assistant United States Attorney, counsel for the United States of America (hereinafter “the Government”), and Nicholas Wooldridge, Wooldridge Law Ltd., counsel for Sigala Salazar (“the Defendant”) (collectively, “the Parties”), that the pre-trial motions currently ordered to be filed on or before May 1, 2020, be vacated and extended an additional thirty (30) days, as well as the corresponding oppositions and reply deadlines.

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The Stipulation is entered into for the following reasons:

1. The additional time requested herein is not sought for purposes of delay, but to permit counsel for the defendant to complete his investigation in this case to determine whether pre-trial motions will be necessary.

2. The defendant is incarcerated and does not object to the continuance.

3. The parties agree to the continuance.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively and complete investigation.

5. Denial of this request for continuance would waste limited judicial resources, and deny counsel for the defendant sufficient time to effectively represent the defendant.

6. Additionally, denial of this request for continuance could result in a miscarriage of justice.

This is the First Stipulation to continue the motion scheduled filed herein.

DATED: April 28, 2020

WOOLDRIDGE LAW, LTD.

NICHOLAS A. TRUTANICH
U.S. Attorney

By /s/ Nicholas M. Wooldridge
NICHOLAS M. WOOLDRIDGE
Counsel for Defendant

By /s/ Supriya Prasad
Supriya Prasad
Assistant United States Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,	:	Case No. 2:19-cr-296
	:	
Plaintiff,	:	
	:	
v.	:	STIPULATION TO
	:	<u>EXTEND PRE-TRIAL</u>
	:	<u>MOTIONS DEADLINE</u>
SIGALA SALAZAR,	:	
	:	
Defendant.	:	

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Counsel for the defendant needs additional time to conduct his investigation in this case in order to determine whether there are any issues that must be litigated and whether pre-trial motions need to be filed.

2. The defendant does not object to the continuance.

3. The parties agree to the continuance.

4. The additional time requested herein is not sought for purposes of delay.

Denial of this request for continuance would waste limited judicial resources, and deny counsel for the defendant sufficient time to effectively represent the defendant

5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

